

AKEEMA LADD (“Plaintiff”), by her attorneys, KIMMEL & SILVERMAN, P.C.,  
allege the following against MEDICREDIT, INC. (“Defendant”):

1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA").

2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before “any appropriate United States district court without regard to the amount in controversy;” 28 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising under the laws of the United States..

**PARTIES**

4. Plaintiff is a natural person residing in Dallas, Texas 75216.



1 limited to (888) 930-4297. The undersigned has confirmed the number as belonging to  
2 Defendant.

3 15. Plaintiff told Defendant they were calling the wrong number and to stop calling.

4 16. However, Defendant continued to call Plaintiff.

5 17. Once Defendant was informed that its calls were unwanted and to stop calling,  
6 there was no purpose for placing further calls, other than to harass Plaintiff.

7 18. After Plaintiff's request to stop the calls was ignored by Defendant, she had no  
8 other option but to install a blocking application to block calls from their phone number.  
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10  
11 **COUNT I**  
12 **DEFENDANT VIOLATED §§1692d and d(5) OF THE FDCPA**

13 19. Section 1692d of the FDCPA prohibits debt collectors from engaging in any  
14 conduct the natural consequence of which is to harass, oppress, or abuse any person in  
15 connection with the collection of a debt.

16 20. Section 1692d(5) of the FDCPA prohibits debt collectors from causing the  
17 telephone to ring or engaging any person in telephone conversation repeatedly with intent to  
18 annoy, abuse or harass.

19 21. Defendant violated §§1692d and d(5) when it called Plaintiff repeatedly  
20 attempting to collect a debt, and continued to call after being told to stop calling.  
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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, AKEEMA LADD, respectfully prays for a judgment as follows:

- a. All actual damages suffered pursuant to 15 U.S.C. § 1692k(a)(1);
- b. Statutory damages of \$1,000.00 for each Plaintiff for the violation of the FDCPA pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c. All reasonable attorneys' fees, witness fees, court costs and other litigation costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and
- d. Any other relief deemed appropriate by this Honorable Court.

**DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that Plaintiff, AKEEMA LADD, demands a jury trial in this case.

DATED: 9/1/2016

KIMMEL & SILVERMAN, P.C.

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